

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

1401 Main Street, Suite 900  
Columbia, SC 29201



DAN F. ARNETT  
CHIEF OF STAFF

Phone: (803) 737-0800  
Fax: (803) 737-0801

JOHN W. FLITTER  
DIRECTOR  
ELECTRIC & GAS AND ECONOMICS DIVISION

November 25, 2013

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
**Public Service Commission of South Carolina**  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Application of Carolina Power and Light Company d/b/a Progress Energy Carolinas,  
Incorporated for the Establishment of Procedures for DSM/EE Programs—Revised Rider DRA  
(Experimental)  
**Docket No. 2008-251-E**

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff ("ORS") has reviewed the revised Rider DRA filed by Duke Energy Progress, Inc. ("Company") in the above-referenced Docket and discussed the changes with Company representatives. The Company states in its filing that the purpose of the revisions is to ensure compliance with new federal standards impacting the use of customer-owned backup generators and to promote continued program participation. The Rider DRA deals with two (2) demand response options—the Emergency Generator Option and the Curtailable Option.

The revisions being proposed by the Company will prevent customers from having to install expensive controls to meet the new stringent emission standards. Additionally, the Company is removing the minimum curtailable demand requirement for the Curtailable Option in order to facilitate the participation of a wider customer base.

ORS has no objection to the Company's proposed revisions.

Thank you for the opportunity to provide comments in this matter.

Sincerely,

John W. Flitter

cc: Dan F. Arnett, Chief of Staff, SC ORS  
Nanette Edwards, Chief Counsel, Director of Legal Services, SC ORS  
Shannon Bowyer Hudson, Esquire, SC ORS  
Courtney Edwards, Esquire, SC ORS  
Timika Shafeek-Horton, Counsel, Duke Energy Carolinas, Inc.